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United States Attorney Southern District of New York

MEMO ENDORSED

United States District Courthouse 300 Quarropas Street White Plains, New York 10601

August 30, 2022

BY CM/ECF

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: United States v. Almighty Ward, et al., 22 Cr. 47 (KMK)

Dear Judge Karas:

The Government respectfully writes, with the consent of the defendants, to request an adjournment of the next pretrial conference in this matter, currently scheduled for September 8, 2022.

As the Court is aware, the parties were all last before the Court on June 16, 2022 for a pretrial conference. Since that appearance, the Government has produced additional Rule 16 discovery, specifically the phone extractions the Government identified during the last status conference. Based on the above, the Government believes that an adjournment of the next pretrial conference for approximately 45 to 60 days will serve the ends of justice and conserve judicial resources as the parties continue to review discovery while also discussing potential pretrial resolutions.

Should the Court grant the adjournment, the Government further respectfully requests, without objection from the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from September 8, 2022 through the date of the rescheduled pretrial conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it would allow defense counsel time to continue reviewing discovery; and it would allow the parties to continue their discussions regarding potential pretrial resolutions.

Accordingly, the Government respectfully encloses a proposed order excluding time.

Granted. The conference is adjourned to 11/ $\frac{1}{6}$ /22, at $\frac{1}{2}$ $\frac{1}{2}$ 00

So Ordered.

8/30/22

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

hv:

Jennifer N. Ong/Nicholas S. Bradley Assistant United States Attorneys (914) 993-1926/(212) 637-1581

cc: Counsel of Record (by CM/ECF)